R-5308-1

IN THE UNITED STTES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

SIGMA RELOCATION GROUP, LLC D/B/A UMOVEFREE.COM,

Opposer, : Cons

Consolidated Proceeding:

v. : Opposition No. 91/170,390

Cancellation No. 92/044,611

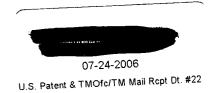
MOVEFORFREE.COM, INC.,

Applicant.

APPLICANT'S MOTION FOR AN EXTENSION OF TIME TO RESPOND TO OPPOSER'S DISCOVERY REQUESTS

Applicant, MOVEFORFREE.COM, INC. ("Applicant"), by Scounsel, hereby moves the Trademark Trial and Appeal Board for a fourteen (14) day extension of time to respond to Opposer's, SIGMA RELOCATION GROUP, LLC D/B/A UMOVEFREE.COM ("Opposer"), discovery requests.

Counsel for Applicant requires an additional fourteen (14) days to prepare appropriate response to Opposer's discovery requests. Opposer's discovery requests are extensive, including forty-nine (49) document requests, fifty (50) requests for admissions, and thirteen (13) interrogatories. Counsel for Applicant has diligently worked to complete responses to Opposer's discovery requests. However, Counsel for Applicant



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had to make an out of town trip due to the failing health of his grandmother. Further, counsel's family has endured a tragedy this past weekend.

Applicant contacted Opposer on July 24, 2006, to request consent to this extension. Opposer would only consent to a four (4) day extension and appears to have conditioned any consent on the waiver of Applicant's objections to the discovery requests.

Accordingly, Applicant submits that there is good cause for this Motion, and requests that the Board grant the Motion, making Applicant's responses due on August 7, 2006.

The undersigned, being hereby warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. 1001, and that such willful false statements may jeopardize the validity of the application or any resulting registration, declares that

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all statements made of his knowledge are true and all statements made on information and belief are believed to be true.

Respectfully submitted,

MOVEFORFREE.COM, INC.

Date: July 24, 2006

Daniel T. Earle

James E. Shlesinger Attorneys for Applicant

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CERTIFICATE OF SERVICE

It is hereby certified that this APPLICANT'S MOTION FOR AN EXTENSION OF TIME TO RESPOND TO OPPOSER'S DISCOVERY REQUESTS has been served upon Opposer by mailing a copy thereof by prepaid First Class mail to Scott L. Harper, Counsel for Opposer, Carstens & Cahoon, LLP, 13760 Noel Road, Suite 900, Dallas, Texas 75240, this 24th day of July, 2006.

Daniel T. Earle